



Health and Human Services Agency California Office of HIPAA Implementation

POLICY MEMORANDUM

TO: Department Chief Deputy Directors
Department HIPAA Coordinators
Department HIPAA Counsel

FROM: CALIFORNIA OFFICE OF HIPAA IMPLEMENTATION (CalOHI)

Title: HIPAA Implementation Schedule	Number: PM 2002-08
Subject: Statewide Master Plan: Schedule Templates for General, Privacy and Transactions and Code Sets Requirements	Issue Date: September 25, 2002
Reference(s): <ul style="list-style-type: none">- Health & Safety Code, Section 130306 (a)(1)(A)- Federal HIPAA Regulations (45 C.F.R. Parts 160 and 164)- CalOHI Information Memorandum 2002-04, HIPAA Privacy State Law Baseline	Expiration Date: Until rescinded or amended

PURPOSE

To provide state departments with Implementation Schedule templates that include the tasks/functions required to ensure compliance with the federal HIPAA regulations.

INTRODUCTION

HIPAA implementation tasks will vary based on the HIPAA status (e.g. covered entity, business associates, etc.) of state departments. Covered entities should complete all tasks on the attached Implementation Schedule templates. Business Associates, Trading Partners, and those impacted by data content should determine the HIPAA impact on their departments and complete only those tasks in the attached templates that pertain to modifications required of your department's business processes and/or automated systems. Those tasks that are not applicable should be noted as N/A. This will be discussed further in the training sessions discussed below.

To achieve an economy of scale in resource utilization, CalOHI suggests that many of these tasks (development of tools and templates) can be accomplished in collaboration with the HIPAA Work Groups and/or amongst 2 or more departments. Departmental staff in these Work Groups are pooling their resources to collectively develop implementation tools and templates.

BACKGROUND

Health & Safety Code, Section 130306 (a)(1)(A) mandates that CalOHI develop a Statewide Master Plan for HIPAA implementation. Federal regulations also require, as part of the HIPAA implementation process, that covered entities document processes, policies, communications, activities, actions or designations. This Implementation Schedule and subsequently the Implementation Plan will contribute to that documentation.

Privacy State Law Baseline

CalOHI's Information Memorandum 2002-04 provides a series of worksheets which lists major HIPAA privacy tasks and requirements, and also identifies the major California state laws that govern health information privacy and pertain to the requirements in the HIPAA privacy regulations. These state law baseline worksheets will assist you in preparing your Implementation Schedule. Information Memorandum 2002-04 can be found on CalOHI's website at www.ohi.ca.gov.

POLICY

All impacted state departments must complete an Implementation Schedule for their impacted programs/functions. The schedule will be updated and maintained, until departments complete implementation of each HIPAA rule. The schedule updates will be provided by departments to CalOHI on a quarterly basis with the quarterly fiscal reports.

TRAINING

Training on the templates for impacted state departments will be provided by CalOHI as follows:

1st Training Session

Tuesday, October 1, 2002, 1:30 – 3:30 pm
744 P Street Auditorium

2nd Training Session

Tuesday, October 8, 2002, 1:30 – 3:30 pm
714 P Street Auditorium

**TEMPLATE
ORGANIZATION**Templates

The Implementation Schedule is a series of templates representing the different HIPAA rules, and one General Implementation Schedule. The latter represents one-time, department-level tasks. Templates provided at this time are:

- General Implementation Schedule
- Privacy Implementation Schedule
- Transactions and Code Sets Implementation Schedule

Template Completion

- Covered entities should complete all tasks on the attached Implementation Schedule templates.
- Business Associates and Trading Partners and those impacted by data content should determine HIPAA impact on their departments and complete only those tasks in the attached templates that pertain to modifications required of your department's business processes and/or automated systems. Those tasks that are not applicable should be noted as N/A.
- Complete one General Implementation Schedule for your entire department. These tasks are one-time project tasks (e.g., establishing executive sponsorship).
- Complete the rule-specific Implementation Schedules (Privacy and Transactions and Codes) for each program/function in your department that you identified as impacted in your initial HIPAA Assessment.
- If you have discovered that the designations for your programs/functions have changed since your initial assessment, please provide documentation of those changes to CalOHI with the submission of your Implementation Schedule.

Department Plan/Schedule

CalOHI will accept other tools/templates from departments that reflect their project's implementation schedule. However, each of the tasks identified on CalOHI's Schedule must be included and reported on by departments even if they use another template.

Task Identification

The Implementation Schedule templates identify the major high-level tasks for HIPAA compliance. It is each department's responsibility to identify any tasks specific to that department that are not described in the templates.

Resources

- CalOHI will provide a Resource Binder (samples of tools and templates) at the Oct. 1, 2002 and Oct. 8, 2002 training sessions.
- As the HIPAA Work Groups develop tools and templates, they

will be provided to state departments via CalOHI Policy/Information Memorandums for inclusion in your Resource Binder, as well as posted to the CalOHI website (www.ohi.ca.gov).

IMPLEMENTATION SCHEDULE USE

- The Implementation Schedules and Implementation Plan will become part of the Statewide Master Plan.
 - CalOHI will merge the schedules into a database for tracking statewide implementation.
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DUE DATE

Who must submit

State departments impacted by HIPAA requirements (covered and impacted entities) are required to complete the Implementation Schedules.

When Due

Each department's Implementation Schedule should be submitted to CalOHI by November 15, 2002. Updates should be submitted by departments quarterly, as part of the CalOHI Quarterly Reporting requirement.

Where to submit

You may transmit your completed Implementation Schedule to your department's CalOHI liaison or you may send hard copies to:

California Office of HIPAA Implementation
1600 Ninth Street, Room 460
Sacramento, California 95814

NEXT STEPS

Implementation Plan

CalOHI will be issuing a Policy Memorandum within the next month asking departments to prepare an Implementation Plan. This memorandum will ask that departments provide a narrative description of how they will accomplish the tasks identified in the Implementation Schedule, as well as any additional tasks each department has identified. The plan should address: strategic approach (e.g., project management office, steering committee, interdisciplinary teams), resources required to accomplish the tasks, communication strategies, issue and risk management and tracking strategies, plus any other strategies the department considers critical for completion of the Implementation Schedule.

CONTACT

Your departmental CalOHI liaison (please see attached listing) if you have any questions.

Original signed by Burt R. Cohen

BURT R. COHEN

Acting Director

California Office of HIPAA Implementation

Attachments: HIPAA Implementation Schedule templates
CalOHI Department Liaison Assignments

cc: HIPAA Steering Committee Members
Steve Kessler, Department of Finance
Peter Harbage, Health and Human Services Agency
Joanne McNabb, Office of Privacy Protection
Department HIPAA Privacy Officers